

GHAJAR EXHIBIT 24

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,) Volume 2
Individual and)
Representative)
)
Plaintiffs,) Case No.
) 3:23-cv-03417-VC
vs.)
)
META PLATFORMS, INC., a)
Delaware corporation;)
)
Defendant.)
)

REMOTE VIDEOTAPED DEPOSITION
OF
CRISTINA VIDEIRA LOPES, Ph.D.
Friday, March 7, 2025
Santa Ovaia de Cima, Portugal

Reported by: B. Suzanne Hull, CSR No. 13495

Page 205

1 THE WITNESS: I'm sorry. I don't know by 10:41:43
2 heart the United States Constitution. 10:41:45
3 BY MR. WEINSTEIN: 10:41:45
4 Q. Okay. 10:41:47
5 A. If you tell me that it is, I believe you. 10:41:49
6 Q. I understand that. I mean, I think -- 10:41:52
7 I think your counsel will know it is, and we can get 10:41:54
8 to that. 10:41:58
9 But -- but on the bottom it says Page 394 of 10:41:58
10 469. 10:42:01
11 Do you see that? 10:42:02
12 A. Yes. 10:42:03
13 Q. So this is on Page 394 of that book. 10:42:04
14 So, again, you are not offering any opinion 10:42:11
15 that Meta -- withdrawn. 10:42:14
16 You are not offering any opinion that Llama 10:42:16
17 is able to reproduce, you know, any significant 10:42:19
18 percentage of these books; correct? 10:42:24
19 A. Correct. 10:42:26
20 MR. WEINSTEIN: Okay. Why don't we mark as 10:42:29
21 Exhibit 15 the next one in order. It is -- it is the 10:42:32
22 same excerpt, but a different item behind it. 10:42:35
23 (Deposition Exhibit Number 15 10:42:35
24 was marked for identification.) 10:43:00
25 THE WITNESS: I got it. 10:43:00

Page 237

1 Dated this 7th day of March, 2025, at
2 Bakersfield, California.

3
4
5
6
7 
8

9 B. Suzanne Hull, CSR No. 13495
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25